

**LAW OFFICES OF LAUREN GOLDBERG, PLLC**

3 Columbus Circle, 15<sup>th</sup> Floor

New York, New York 10019

lg@lgoldberglaw.com

TELEPHONE: (646) 452-8380

FACSIMILE: (646) 452-8663

July 15, 2022

**VIA ECF**

Honorable Gary R. Brown  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Hernandez et al v. The Money Source  
17 CV 6919 (GRB)(AYS)

Hon. Gary R. Brown:

I represent the Plaintiffs in the above referenced matter and am writing to request permission to respond to Joseph M. Labuda's response to order to show cause why he should not be sanctioned. [Document 155] In his papers, Mr. Labuda makes numerous erroneous characterizations about our interactions that should be addressed. However, given that he filed his motion papers on Friday, July 15<sup>th</sup> early evening and trial is set for Monday, July 18, I would ask for permission to respond to his papers after trial has concluded since there are various trial matters that are pressing. I would also ask for permission to submit my affirmation for fees with my response.

Respectfully Submitted,

/s/

Lauren Goldberg

cc: Frank Giglio, Esq Counsel for Defendant (via ECF)  
cc: Robert Goner, Esq. Counsel for Defendant (via ECF)  
cc: Joseph M. Labuda, Counsel for Defendant (via ECF)  
cc: Michael Mule, Counsel for Defendant (via ECF)